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## RECEIVED

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AT 8:30 M WILLIAM T. WALSH CLERK

## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

SAWHORSE ENTERPRISES, INC.,

Plaintiff,

-against-

CHURCH & DWIGHT, INC.,

Defendant.

Civ. No. 3:12-CV-06811 (FLW) (TJB)

Return Date: March 18, 2013

Document Electronically Filed

**PROPOSED** ORDER TO SEAL

THIS MATTER having been brought before the Court by Proskauer Rose LLP, attorneys for Church & Dwight Co., Inc. ("Church & Dwight") by way of a motion to seal a portion of the record pursuant to Local Civil Rule 5.3 and the Court having considered the will me opposition having been filed, written submissions of counsel in support thereof, and the Court having found that:

- 1. Church & Dwight has filed its Reply Memorandum in Further Support of its Motion to Dismiss the First Amended Complaint and to Stay Discovery Pending Resolution of that Motion;
  - 2. Church & Dwight believes that if certain of these materials are not kept

confidential, Church & Dwight will suffer a clearly defined, serious, and significant injury.

Thus, in Church & Dwight's opinion, it has legitimate private business interests in keeping these materials from public disclosure, such interests warranting the relief sought.

3. The relief sought restricts access only to those materials that the parties consider to be confidential, the least restrictive available option that will protect the confidentiality of those materials.

THEREFORE, for good cause shown,

IT IS upon this 2/5tday of March 2013,

**ORDERED** that Church & Dwight's motion to seal is hereby granted, and the confidential portions of "Defendant Church & Dwight's Reply Memorandum in Further Support of its Motion to Dismiss the First Amended Complaint and Stay Discovery Pending Resolution of that Motion" shall also be sealed and excluded from the public record.

Honorable Tonianne / Bongiovanni, U.S.M.J

[blocket Entry No. 39] is terminated.